

From: [Moore, Gary](#)
To: [Webster, Susan](#); [Crossland, Ronnie](#)
Subject: CES Update
Date: Sunday, August 03, 2014 4:56:18 PM
Attachments: [pic 1.png](#)
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[photo 2.JPG](#)
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[8.3.14 CES Spill Update.docx](#)

Susan/Ronnie:

The TCEQ and EPA will continue operations on Monday. The coordination has been excellent. I have not had any conversations with residents today but will try again as we get closer to completing the residential areas. Here is my update. I may be pushing the envelope but I think it is necessary to provide my professional opinion.

Spill Update: 8/2/14 - CES Environmental Services Chemical Spill: Houston, Harris County, TX

On 8/2/14, the TCEQ and EPA Teams remain on-site. The TCEQ Team is conducting all direct cleanup actions. The EPA Team is providing technical assistance and documenting response activities. The TCEQ Team activities will consist of:

1. Removing oily contaminated storm water from the residential ditches and placing in frac tanks;;
2. Decontaminating the impacted soils and ditches with fresh water and placing in frac tanks;
3. Decontaminating the oily residue from the residential roadways with pressure washer and placing water into frac tanks;
4. Removing free oil from storm water that has collected on the facility and placing in frac tanks;
5. Removing storm water from on-site storm water ditch leading to off-site release;
6. Adding additional berms and reinforcing existing berms around the facility to reduce the likelihood of off-site migration of contaminated storm water;
7. Sampling of contaminated water collected to profile for waste disposal/treatment;
8. Evaluating existing containers to insure that steps are taken to reduce the likelihood of overtopping during rain events;

The EPA Team activities consist of:

1. Providing technical assistance to the TCEQ Team;
2. Interacting with the public along with the TCEQ Team;
3. Collecting a sample of the oily material within the residential ditches;
4. Collecting a sample of the source material within TT408 and TT407;
5. Collecting air samples on-site and off-site as determined appropriate;
6. Monitoring the air for VOCs;
7. Evaluating existing containers with TCEQ to insure that steps are taken to reduce the likelihood of overtopping during rain events;
8. Evaluating fence repair needs to secure the facility;
9. Documenting the response activities for the EPA Report;

The belief is that the spill was a result of vandalism. The facility is not secure as the fencing has been stolen or otherwise compromised allowing trespassers and vandals unabated access to the facility. Securing the facility may need to be done

but it is apparent that this alone will not stop the vandals and/or thieves from accessing the facility and causing releases that endanger the neighborhood. Additionally, this area is prone to flooding rains which easily erode and earthen containment structures and allow contaminants to migrate off-site and into the residential neighborhoods as was experienced in this spill. The only solution to this problem is an immediate authorization to rid the site of all the chemicals and at a minimum the cleanup of any visible sources of chemicals on the asphalt, concrete, and soil. The population knows that we are here and they expect that we will protect them from this impending disaster. The longer the delay, the higher the risk of another incident and an embarrassing outcome.

Gary Moore

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